

EXHIBIT 8

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1	IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION	
2		
3	SERGEY MAYOROV, Plaintiff,	INDEX
4)	PAGE
5	vs.	2 Appearances..... 2
6	UNITED STATES OF AMERICA,) Defendant.)	JENIFER WALL
7		MR. RAJADURAI..... 4
8		WALL EXHIBIT
9		PAGE
10		8 4..... 20
11		9
12	The deposition of JENIFER WALL, taken	10
13	pursuant to the Federal Rules of Procedure, before	11
14	Melody A. Monk, Certified Shorthand Reporter No.	12
15	14 084-004772, at National Immigrant Justice Center,	13
16	15 208 South LaSalle Street, Suite 1300, Chicago,	14
17	16 Illinois, on Friday, June 6, 2014, commencing at	15
18	17 11:03 a.m. pursuant to notice.	16
19	18	17
20	19	18
21	20	19
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1	A P P E A R A N C E S	
2		
3	FOR THE PLAINTIFF:	JENIFER WALL,
4	ABIMAN RAJADURAI Littler Mendelson, PC	called as a witness herein, having been first duly
5	321 North Clark Street	sworn, was examined and testified as follows:
6	Suite 1000	
7	Chicago, Illinois 60654	EXAMINATION
8	312.795.3232	
9	312.275.7110 (fax)	BY MR. RAJADURAI:
10	Arajadurai@littler.com	
11	And	Q. Good morning, Agent Wall. My name is
12	MARK FLEMING	Abiman Rajadurai, and I represent a plaintiff in
13	National Immigrant Justice Center 208 South Lasalle Street, Suite 1300	this case. This is co-counsel, Mark Fleming.
14	Chicago, Illinois 60604	Could you state your name and spell it
15	312.660.1628	for the record?
16	312.660.1505 (fax)	A. Sure. It's Jenifer, J-E-N-I-F-E-R,
17	Mfleming@heartlandalliance.org	middle initial L., last name Wall, W-A-L-L.
18		Q. Have you ever been deposed before?
19	FOR THE DEFENDANT:	A. No.
20	JAMES M. KUHN, SR.	Q. Okay. I'll just go through a basic
21	Assistant United States Attorney	intro right now of the deposition process.
22	219 South Dearborn Street	Basically it's a question-and-answer format. I'll
23	Chicago, Illinois 60604	ask a question and have an answer. Your attorney
24	312.353.1877	might object. Unless he tells you not to answer
	James.kuhn@usdoj.gov	specifically, you can go ahead and answer if you
		understand the question.
		If there's ever a point you don't
		understand a question, just ask me to restate it or
		clarify it. I'll try not to speak over you. Wait

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<p>1 until I'm done with my question just so it's easier 2 for the transcript. You have to answer verbally 3 instead of head nods or hand gestures just so she 4 can record the information. We can take a break 5 whenever you'd like.</p> <p>6 Is there any, you know, medication or 7 anything you're taking that might prevent you from 8 testifying truthfully or completely today?</p> <p>9 A. No.</p> <p>10 Q. Okay. Did you review any documents to 11 prepare for this document?</p> <p>12 A. Yes.</p> <p>13 Q. And what documents were there?</p> <p>14 A. It was the Stateville -- the list of 15 detainees that came through Stateville the day 16 Mr. Mayorov came through, and Mr. Morton's memo.</p> <p>17 Q. Okay. And did you happen to bring 18 those with you today?</p> <p>19 A. I did not, no.</p> <p>20 Q. And as far as you know, they've been 21 produced in this litigation?</p> <p>22 A. I am not sure.</p> <p>23 Q. Okay. That's fine.</p> <p>24 Did you discuss this case or deposition</p>	<p>1 officer.</p> <p>2 Q. And what does CBP stand for?</p> <p>3 A. Customs and Border Protection.</p> <p>4 Q. Okay. And when would you have received 5 the Customs and Border Protection training?</p> <p>6 A. I was hired in December 2003, so it 7 would have been in the beginning of 2004.</p> <p>8 Q. Okay. What year did you graduate 9 college?</p> <p>10 A. 2002.</p> <p>11 Q. Okay. And what was your first 12 employment after graduating college?</p> <p>13 A. It was during college.</p> <p>14 Q. I guess, when was your first employment 15 after -- or if it continued on?</p> <p>16 A. It continued.</p> <p>17 Q. Okay. And what was that position?</p> <p>18 A. It was at a nonprofit organization.</p> <p>19 Q. And what was that called?</p> <p>20 A. People, Inc.</p> <p>21 Q. Okay. And what was your title there?</p> <p>22 A. I'm not sure. We did -- dealt with 23 developmentally disabled people --</p> <p>24 Q. Okay.</p>
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<p>1 with anyone other than Mr. Kuhn?</p> <p>2 A. No.</p> <p>3 Q. Okay. Did you attend high school?</p> <p>4 A. Yes.</p> <p>5 Q. What high school did you attend?</p> <p>6 A. Niagra Wheatfield.</p> <p>7 Q. And did you graduate?</p> <p>8 A. Yes, I did.</p> <p>9 Q. Did you attend college?</p> <p>10 A. Yes.</p> <p>11 Q. Where did you attend college?</p> <p>12 A. The University at Buffalo.</p> <p>13 Q. And did you graduate from the</p> <p>14 University of Buffalo?</p> <p>15 A. Yes, I did.</p> <p>16 Q. What was your degree in?</p> <p>17 A. Political Science - Prelaw.</p> <p>18 Q. Okay. Any additional schooling?</p> <p>19 A. Obviously the training for my current 20 position, yes.</p> <p>21 Q. Okay. Any other professional 22 certifications that you studied for or earned?</p> <p>23 A. My current position, immigration 24 enforcement agent. And then before that, CBP</p>	<p>1 -- basically just interacting, working 2 with them, helping them perform --</p> <p>3 Q. Sure.</p> <p>4 A. -- functions.</p> <p>5 Q. And what was your reason for leaving 6 that position?</p> <p>7 A. I was hired with Customers and Border 8 Protection.</p> <p>9 Q. Okay. And what year was that?</p> <p>10 A. I was hired in December 2003.</p> <p>11 Q. And what was your title upon being 12 hired there?</p> <p>13 A. Customers and Border Protection 14 officer, CBPO.</p> <p>15 Q. Okay. And what were your job duties 16 and responsibilities there?</p> <p>17 A. I worked at a port of entry. So when 18 people would come into the United States, I'd have 19 to determine their -- whether they were a citizen, 20 interview them, determine whether they were able to 21 enter the United States, interview them to see if 22 possibly they had any contraband, do searches and 23 seizures, make arrests.</p> <p>24 Q. Okay. Were you involved with</p>

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<p>1 interviewing individuals as part of determining 2 their citizenship there?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Did you receive training on how 5 to do that?</p> <p>6 A. Yes.</p> <p>7 Q. Where did you receive that training?</p> <p>8 A. FLETC. It's in Glynco, Georgia.</p> <p>9 Q. Okay. And do you remember who 10 conducted the training?</p> <p>11 A. No.</p> <p>12 Q. Okay. Fair.</p> <p>13 And how long were you in that position?</p> <p>14 A. I was -- from December of 2003 until 15 June of 2006.</p> <p>16 Q. Okay. And do you remember who you 17 reported to?</p> <p>18 A. There were various supervisors. It was 19 shift work --</p> <p>20 Q. Okay.</p> <p>21 A. -- at the border. It's a 24-hour day 22 operation. One of them would be Bulson, 23 B-U-L-S-O-N.</p> <p>24 Q. Okay.</p>	<p>1 go in front of the immigration judge, sometimes 2 escorting the person back to their country.</p> <p>3 Q. And where were you first -- what 4 locations have you worked in as an IEA?</p> <p>5 A. Both Broadview and the district office 6 at 101 West Congress Parkway.</p> <p>7 Q. Okay. And do you know what years 8 you've been at either of those two?</p> <p>9 A. No. We have a six-month rotation for 10 the most part. Now it's a year, but for the most 11 part every six months you'd be, you'd be bidding 12 for where you wanted to be located.</p> <p>13 Q. Okay. Were you ever located at 14 Stateville Correctional Center?</p> <p>15 A. Yes, I was.</p> <p>16 Q. Okay. What years would you have been 17 there?</p> <p>18 A. I'd say off and on between 2008 and 19 2012.</p> <p>20 Q. Okay. Would that also be on a 21 six-month cycle?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And during these six-month 24 rotations, would your supervisor change, or would</p>	
<p>1 A. He's a -- Warner was another one, 2 W-A-R-N-E-R. Heinrich (phonetical) -- I'm not sure 3 how to spell that -- he was on another shift.</p> <p>4 Q. Sure.</p> <p>5 A. So there was at least five supervisors.</p> <p>6 Q. Okay. And what was your reason for 7 leaving that position?</p> <p>8 A. I took the position with ICE.</p> <p>9 Q. Okay. And would that have been in 10 June 2006 when you started with ICE?</p> <p>11 A. That's correct.</p> <p>12 Q. Okay. And what was your first title 13 upon being hired by ICE?</p> <p>14 A. Immigration enforcement agent.</p> <p>15 Q. And is that your position today?</p> <p>16 A. That's correct.</p> <p>17 Q. Okay. And what are your job duties and 18 responsibilities under -- as an IEA?</p> <p>19 A. Basically we determine alienage and 20 possible deport -- deportability of people we 21 interview.</p> <p>22 Q. Okay.</p> <p>23 A. It also includes picking up people from 24 jail, transporting, writing up their paperwork to</p>	<p>1 that stay constant?</p> <p>2 A. Yes, my supervisor would change.</p> <p>3 Q. Okay. Do you mind breaking that down 4 by time, if you remember who your supervisors were?</p> <p>5 A. In the beginning, I can't say from 6 exactly what date to what date, Swazell 7 (phonetical), Joseph Swazell was a supervisor, and 8 he was directly above me. He was the SIEA. And 9 then towards the end of that duration, it was 10 Supervisor Wright, Sean Wright, S-E-A-N, 11 W-R-I-G-H-T.</p> <p>12 Q. Do you recall, when you were at 13 Stateville, who your supervisor would have been? 14 Would that --</p> <p>15 A. That was the time I was at Stateville, 16 both of those supervisors.</p> <p>17 Q. Okay. Great.</p> <p>18 A. Yes.</p> <p>19 Q. And did you have anyone who reported to 20 you while you worked as an IEA?</p> <p>21 A. No, I'm the low person on the totem pole. No one reports to me.</p> <p>22 Q. Okay. When you first started as a IEA, 23 did you receive any training through a seminar or</p>	Page 12

1 written materials? 2 A. Yes. We went to FLETC for training -- 3 well, I went to FLETC for training. 4 Q. And that's in Glynco, Georgia? 5 A. That's correct. 6 Q. And what, what subject matter was 7 covered at the training? 8 A. The INA, the Immigration and 9 Nationality Act; detention standards; various 10 database checks. 11 Q. Okay. Do you remember who conducted 12 that training? 13 A. In the -- we switched teachers because 14 my teacher rotated out. My first teacher was Scot 15 Jackson. Scot, with one "T," Jackson. 16 Q. And do you remember his title? 17 A. No, I -- I'm not sure. 18 Q. Okay. You currently are an IEA, 19 correct? 20 A. That's correct. 21 Q. And do you still report to Mr. Wright? 22 A. No. 23 Q. Who is your current supervisor? 24 A. My current supervisor is not an SIEA;	Page 13 1 Q. -- or investigate? 2 And what training did you receive? 3 A. The training in Georgia covered placing 4 detainees. 5 Q. Okay. Did you receive ongoing training 6 as you've been an IEA? 7 A. Are you referring to detainees? 8 Q. On detainees, yes. 9 A. Not training, no. 10 Q. Okay. Do you ever receive written 11 materials on updated policy or changes in policy? 12 A. Yes. 13 Q. How frequently would you say that 14 happens? 15 A. I'd say maybe every six months you'll 16 get a different directive or different guidance. 17 Q. And do you have the authority to issue 18 a detainee? 19 A. I do, yes. 20 Q. Okay. Do you follow a standard 21 procedure when deciding whether to issue a 22 detainee? 23 A. For the most part, yes. Of course, 24 there's exceptions to any rule.
Page 14 1 it's a SDDO, supervisory detention deportation 2 officer. His name is Podgorni, P-O-D-G-O-R-N-I. 3 Q. As far as you know, what's the 4 difference between an SIEA and an SDDO? 5 A. And SIEA, it's less pay, a lower grade. 6 SDDO is just a higher grade, higher title. 7 Q. Okay. Do you know what an immigration 8 detainer is? 9 A. I do. 10 Q. What is an immigration detainer? 11 A. It's -- if you look at a immigration 12 detainer, it's pretty straightforward of what it 13 is, if you read an immigration detainer. 14 I'd have to look at the particular 15 immigration detainer you're referring to because 16 there's different boxes you check off and it could 17 mean one of many things. 18 Q. Okay. And did you receive training 19 regarding detainees when you started as an IEA? 20 A. You mean when I came back to my office? 21 Q. When you were hired as an IEA, did 22 you -- do you recall receiving training on how to 23 issue a detainer or -- 24 A. Yes.	Page 14 1 Q. Sure. Is there a documented procedure 2 of certain issues that you have to look into? 3 A. No. 4 Q. No? 5 A. No. 6 Q. What are, what are the items that you 7 look into when you're deciding whether to issue a 8 detainer? 9 A. Alienage, first of all, whether the 10 person was born in the United States or whether 11 they possibly derived or -- derived citizenship or 12 naturalized. If a person's here illegally, 13 removability. If they are a resident, they're 14 still subject to the INA and they have to follow 15 the laws. 16 Q. And do you prepare documents as you're 17 gathering and compiling all this information? 18 A. You mean as I'm creating a detainer? 19 Q. Yeah. 20 A. Yes, I do. 21 Q. Okay. What kind of documents do you 22 create? 23 A. During our time at Stateville, each 24 thing is different. During our time at Stateville,

	Page 17	Page 19
<p>1 if we put a detainer on someone, we'd have a work 2 folder on that person.</p> <p>3 Q. Okay. What were your job duties and 4 responsibilities as an IEA at Stateville?</p> <p>5 A. At Stateville?</p> <p>6 Q. Yes.</p> <p>7 A. At Stateville, we talk to every single 8 inmate coming through the prison, and then we talk 9 to the person to see if we were interested in 10 investigating their alienage and deportability.</p> <p>11 And also part of that would be going to the records 12 office and placing detainees on certain 13 individuals.</p> <p>14 Q. Okay. I guess I'll start with 15 <u>Exhibit 1</u> from before. If you would just grab 16 this.</p> <p>17 Have you seen this document before?</p> <p>18 A. This one?</p> <p>19 Q. Yes.</p> <p>20 A. The memo? Yes, I have.</p> <p>21 Q. What's your understanding of the memo?</p> <p>22 A. My understanding of the memo is that if 23 somebody claims to be a United States citizen when 24 they're in custody, that we are to consult our</p>	<p>1 Q. Sure. And then I guess if we turn back 2 to page 1, in the second paragraph there, there's a 3 statement that says, towards the bottom of the 4 second paragraph, As a matter of law, ICE cannot 5 assert its civil immigration enforcement authority 6 to arrest and/or detain a USC.</p> <p>7 Is that correct?</p> <p>8 A. That's correct.</p> <p>9 Q. And it's your understanding that that's 10 the policy regarding all detainees that are 11 possibly issued?</p> <p>12 A. No.</p> <p>13 Q. What was your -- what's your 14 understanding of that statement?</p> <p>15 A. Which paragraph are you referring to?</p> <p>16 Q. The bottom of the second one, the 17 statement that ICE cannot assert its enforcement 18 authority to arrest or detain a U.S. citizen.</p> <p>19 A. Okay. I understand that, but if you're 20 placing a detainer, sometimes you're still 21 investigating whether the person is a citizen.</p> <p>22 Q. So it's possible to -- I guess going 23 back, so are you saying it is possible that a 24 detainer would be issued against a U.S. citizen?</p>	
<p>1 local OCC.</p> <p>2 Q. And do you know who that would have 3 been, who you would have had to consult?</p> <p>4 A. OCC consists of several individuals.</p> <p>5 But, again, it's, it's stating if they're in ICE 6 custody, which at Stateville the subject would not 7 have been in ICE custody.</p> <p>8 Q. Okay. Did you ever receive any 9 training on how to implement the policies in the 10 memo?</p> <p>11 A. Training?</p> <p>12 Q. Yes.</p> <p>13 A. No.</p> <p>14 Q. Okay. And do you know how you would 15 have received this document? Would this have been 16 electronic or given to you at the facility?</p> <p>17 A. It would have been via e-mail more than 18 likely.</p> <p>19 Q. Okay. And it's your understanding that 20 if a directive comes out, that the policies therein 21 should be followed when issuing a detainer?</p> <p>22 A. Yes, when issuing a detainer. But what 23 you're referring to, it says claims by detained 24 individuals.</p>	Page 18	Page 20

	Page 21	Page 23
<p>1 Q. Oh, sorry.</p> <p>2 Does a detainer request detention of</p> <p>3 the individual?</p> <p>4 A. Not necessarily. It states that we're</p> <p>5 investigating whether the person is subject to</p> <p>6 removal --</p> <p>7 Q. Okay.</p> <p>8 A. -- basically. I...</p> <p>9 Q. And as far as you know, are there</p> <p>10 different policies for when somebody would be</p> <p>11 detained, or would be subject to detention upon</p> <p>12 issuance of the detainer, or whether they wouldn't</p> <p>13 be detained during the investigation?</p> <p>14 A. I am not clear on your question.</p> <p>15 Q. Sure. Let me try to restate that.</p> <p>16 That was a lot right there.</p> <p>17 When this form is checked out, does</p> <p>18 that -- is there anything that indicates, or is</p> <p>19 there any policy that says the individual should</p> <p>20 be, you know, under detention since this box has</p> <p>21 been checked, or is there a -- is there really no</p> <p>22 policy about whether detention should occur or not?</p> <p>23 A. There really is no policy. We request</p> <p>24 that the person be turned over to us on one of the</p>	<p>1 to us at the end of his sentence. So it's</p> <p>2 requesting that the subject be turned over to</p> <p>3 immigration. And as far as 48 hours, I've worked</p> <p>4 with the state and they do not hold people for 48</p> <p>5 hours. So it's a request.</p> <p>6 Q. Okay. And as far as you know, is it</p> <p>7 possible to derive U.S. citizenship through one's</p> <p>8 parents?</p> <p>9 A. Yes.</p> <p>10 Q. And are you familiar with the</p> <p>11 derivative citizenship available to a child through</p> <p>12 to the Child Citizenship Act of 2000?</p> <p>13 A. Yes, I am.</p> <p>14 Q. What's your understanding of that form</p> <p>15 of derivative citizenship?</p> <p>16 A. My understanding is -- I'd have to look</p> <p>17 at the act itself to see the dates, but if somebody</p> <p>18 is a child at the time that their parent becomes a</p> <p>19 citizen, that they derive citizenship through that</p> <p>20 parent. There are, there are stipulations of --</p> <p>21 the person has to -- that the person has to meet to</p> <p>22 become a citizen.</p> <p>23 Q. Okay. And do you take certain steps to</p> <p>24 investigate whether a subject inmate that you</p>	
<p>1 boxes on the detainer, but we do not make any</p> <p>2 requests to the jail, the prison, wherever the</p> <p>3 person may be, of how that person should be</p> <p>4 treated, I guess, or detained.</p> <p>5 Q. Okay. And do you know if this specific</p> <p>6 detainer required that Mr. Mayorov be detained?</p> <p>7 MR. KUHN: I'm going to object to the</p> <p>8 vagueness of the question. Be detained by who?</p> <p>9 IDOC or ICE?</p> <p>10 MR. RAJADURAI: IDOC.</p> <p>11 Q. Any special other detention by IDOC.</p> <p>12 A. A detainer does not request a person be</p> <p>13 detained. It asks for the person to be turned over</p> <p>14 to us at the end of their term with that particular</p> <p>15 agency if a certain box is checked. I mean,</p> <p>16 there's other boxes you could check: please cancel</p> <p>17 this detainer. I mean, there's a lot of different</p> <p>18 ways this can go. It's not really a clear</p> <p>19 question.</p> <p>20 Q. Okay. But the -- but this document</p> <p>21 would allow for the individual to be detained for</p> <p>22 an additional 48 hours?</p> <p>23 A. This particular detainer, it's</p> <p>24 requesting that the facility turn the subject over</p>	<p>1 screen would have derived citizenship?</p> <p>2 A. Absolutely, yes.</p> <p>3 Q. What steps would those be?</p> <p>4 A. If -- now, each person -- each agent</p> <p>5 would have a different technique. Are you asking</p> <p>6 what I would do normally?</p> <p>7 Q. Well, I guess, let's start -- is there</p> <p>8 any general policy that all agents are required to</p> <p>9 follow when someone might be a potential derived</p> <p>10 citizen?</p> <p>11 A. No.</p> <p>12 Q. Okay. And what would you do in your</p> <p>13 practice?</p> <p>14 A. Normally, if I'm interviewing a</p> <p>15 subject, part of my routine questioning is asking</p> <p>16 about their parents and the parent's nationality.</p> <p>17 Unfortunately, in prison, a lot of people don't</p> <p>18 know what nationality their parents are or if they</p> <p>19 became citizens. If the subject claims that one of</p> <p>20 the parents are a citizen, we -- well, I always</p> <p>21 look further into it to see if they could possibly</p> <p>22 derive citizenship.</p> <p>23 Q. Okay. And how would you do that?</p> <p>24 A. It depends on the situation. Sometimes</p>	Page 24

1 they say, my dad was born in the United States. So 2 I'll get dad's phone number and call dad up and 3 talk to dad. Other times, they say, my dad derived 4 citizenship or my dad -- I'm sorry, my dad 5 naturalized. In that case, I would be able to look 6 up the date of his natural -- the father's 7 naturalization. 8 Q. Okay. And where would you look that 9 up? 10 A. In CIS. 11 Q. And are you required to interview an 12 inmate who you think might have derived 13 citizenship? 14 A. I'm not required to interview anyone. 15 I have some leeway with that. 16 Q. Okay. Well, how do you decide whether 17 you should interview or not interview a subject? 18 A. Your definition of interview, by -- 19 what is your definition of interview? 20 Q. I guess meeting with the inmate and 21 asking the questions about their citizenship. 22 A. We -- as far as talking to an inmate, 23 every single person that comes through the Illinois 24 Department of Corrections we -- at Stateville, we	Page 25 1 additional steps or other steps when you have met a 2 individual claiming derived citizenship through 3 this act but haven't filed that N-600? 4 A. Normally I just advise the person to 5 file an N-600. That's about all. I -- if somebody 6 claims that they derived, and if I believe that 7 subject's claim, that's the only action I would 8 take. 9 Q. Okay. I know you rotate facilities. 10 How many times have you been rotated through 11 Stateville? 12 A. I'd say three. 13 Q. Okay. And do you know roughly what 14 time periods those were? 15 A. Between 2007 and 2012, I'd say. 16 Q. And they're always six months at a 17 time? 18 A. Not necessarily, not necessarily. 19 Sometimes you'll fill in for somebody. But if 20 you're stationed out there, it would be for a 21 six-month time frame. 22 Q. Okay. And did you choose to be 23 assigned to Stateville, or are you assigned there? 24 A. I chose to be assigned there.
Page 26 1 talked to that day. 2 Q. Okay. And are there specific questions 3 you ask them specifically about their citizenship? 4 A. No, nothing specific. 5 Q. Okay. Do you know if someone who 6 derived citizenship through the Child Citizenship 7 Act needs to file paperwork or an application to be 8 deemed a citizen? 9 A. Yes. Eventually -- well, the person 10 should file an N-600. 11 Q. Okay. And if they haven't filed an 12 N-600, are you aware of whether they are considered 13 a citizen or not? 14 A. For me, in my investigation, I'm going 15 to -- I'm not -- if I believe someone may be a 16 United States citizen, I'm not going to pursue -- 17 I'm not going to place a detainer at that point. 18 I'm going to look into it further. 19 Q. Okay. I guess my question is: Under 20 the Child Citizenship Act, and your understanding 21 of the act, would the individual need to file an 22 N-600 to be considered a citizen? 23 A. For my understanding, no. 24 Q. Okay. Do you, do you take any	Page 26 1 Q. Okay. How many ICE agents typically 2 are at Stateville, you know, during these various 3 three periods? 4 A. Usually there's three agents assigned. 5 However, if somebody calls in sick or somebody has 6 vacation, it could be two. 7 Q. Okay. And are you all IEAs, or are 8 there other different titles for those individuals? 9 A. For the most part, we all are IEA, but 10 sometimes the deportation officer will even fill 11 in. But the people actually assigned to Stateville 12 are all IEAs. 13 Q. Okay. And you're re -- the person 14 you'd report to there would be either Swazell or 15 Wright during that time period? 16 A. Yes, during that time period. 17 Q. Okay. I guess we'll start with what 18 was Exhibit 2, this document here. 19 Do you recognize this document? 20 A. Yes, I do. 21 Q. Okay. What is this? 22 A. It's the NRC Intake Property Inventory 23 Record. It's a state document. It's not our 24 document.

1 Q. Okay. And as far as you know, does 2 this reflect that all of the inmates have to be 3 processed by ICE or go through ICE processing? 4 A. I wouldn't say process, but they all 5 have to speak to ICE, yes. 6 Q. Okay. Is there ever a case you 7 remember where someone didn't have to go through 8 ICE as part of this process? 9 A. Sometimes, with time constraints, 10 they'll skip ICE on a particular day. Normally, 11 they will have to report to us the following day. 12 But for the most part, in order for them to get 13 cleared, they have to speak to us, yes. 14 Q. And do you see this document? It's not 15 color, but it's highlighted over ICE. Is that 16 something you're required to do after seeing an 17 inmate? 18 A. It's, it's not a requirement, but it 19 was just part of our everyday activity at 20 Stateville saying that we had talked to that 21 person. 22 Q. Okay. Any other notes you had to make 23 about an individual that they had been seen by ICE? 24 A. If we placed a detainer on that date,	Page 29 1 Mr. Rivera? 2 A. To be honest, I'm not sure. 3 Q. Okay. Any other ongoing training other 4 than the directives that we've seen or example we 5 showed you? 6 A. We have video classes we'll take on 7 various subjects, not necessarily on detainees. 8 Q. Okay. 9 A. But... 10 Q. On average, how many inmates would you 11 screen per day? 12 A. It could vary anywhere between -- on 13 the low number, I'd say 50; on the high end, I'd 14 say 300. 15 Q. And are you alone during these 16 interviews, or is it usually with another agent? 17 A. That depends on our staffing for the 18 particular day -- 19 Q. Okay. 20 A. -- and how busy we are. 21 Q. Typically, what would you say for a day 22 of 50 versus a day of 250? 23 A. On a day of 50, you might have two 24 agents in the room interviewing a subject and you
Page 30 1 we would write detainer next to ICE. 2 Q. Okay. Have you processed inmates for 3 ICE, you know, ever since you arrived at 4 Stateville, or did that start at a later date? 5 A. I'm not -- what do you mean by 6 processed? 7 Q. Sure. Let me -- I guess through the 8 screening process when inmates come in, has that 9 been part of your job duties since you started day 10 one at Stateville, or did you start doing that at a 11 later date? 12 A. Pretty much day one at Stateville, 13 that's the process. 14 Q. Sure. 15 A. You talk to everybody. 16 Q. Did you receive any training upon 17 moving to Stateville on how to screen an inmate? 18 A. Not official training, just from the 19 previous agents that were stationed out there. 20 Q. Okay. Was there anyone you shadowed or 21 followed to see how a screening process worked? 22 A. Yeah -- yes. I'd say Immigration 23 Enforcement Agent Rivera, who is now a DO. 24 Q. Okay. And how long did you shadow	Page 30 1 might only have -- normally it was only one person 2 in the hall, the -- depending on the day. 3 Q. Okay. And were there standard 4 questions or an operating procedure that you 5 followed for screening the individuals? 6 A. No. 7 Q. Okay. Did you kind of create your own 8 script or list of questions that you would go 9 through? 10 A. No, it would depend on the day what I'd 11 ask the person. 12 Q. Okay. And what information would you 13 seek on a -- you know, you mentioned you changed 14 the information. What -- generally, what 15 information would you seek? 16 A. Sometimes I just try to make 17 conversation with the subject to see if they had 18 any sort of an accent. Other times, I'd -- if I 19 was more suspicious that the person wasn't from 20 Chicago or the United States or -- I'd ask them 21 additional questions. But that would, that would 22 vary depending on the person and... 23 Q. And then are you required to ask 24 specific questions to determine if someone's a

<p>1 United States citizen?</p> <p>2 A. No.</p> <p>3 Q. Okay.</p> <p>4 A. No.</p> <p>5 Q. Are you required to document that you</p> <p>6 asked about citizenship, or the answer that you</p> <p>7 received?</p> <p>8 A. No.</p> <p>9 Q. Okay. What would you say ICE's</p> <p>10 objectives are during this screening process?</p> <p>11 A. This would be my understanding. It</p> <p>12 wouldn't be ICE's mission, I'd say. But for the</p> <p>13 most part, we're looking for violent individuals</p> <p>14 that -- violent or people that may be a threat to</p> <p>15 society that may be removable from the United</p> <p>16 States that we want to investigate.</p> <p>17 Q. Okay. And did you ever take notes</p> <p>18 about the individuals that you screened or write</p> <p>19 down information about them in any sort of report?</p> <p>20 A. Yes.</p> <p>21 Q. What kind of documents are these?</p> <p>22 A. We do a scratch 213.</p> <p>23 Q. Was that scratch?</p> <p>24 A. Scratch, like -- a 213 normally is done</p>	<p>Page 33</p> <p>1 Q. All right.</p> <p>2 MR. KUHN: Just tell him the general</p> <p>3 purpose.</p> <p>4 THE WITNESS: Okay.</p> <p>5 MR. RAJADURAI: Sure, just general.</p> <p>6 A. It would just have basic biographical</p> <p>7 information on the subject, and it would also</p> <p>8 record that we placed a detainer on the subject.</p> <p>9 Q. Okay. If you determine that an</p> <p>10 individual is a United States citizen, what</p> <p>11 procedure do you follow after that, or what steps</p> <p>12 do you take?</p> <p>13 A. We're in the enforcement part of the</p> <p>14 house. If somebody is a USC -- if we think that</p> <p>15 the person is a United States citizen, we're not</p> <p>16 keeping any information on that person.</p> <p>17 Q. Okay. Did you ever encounter a case</p> <p>18 where an individual was determined to be a United</p> <p>19 States citizen but had an ENFORCE database entry</p> <p>20 with their name?</p> <p>21 A. It's possible, yes.</p> <p>22 Q. What situations would that occur in?</p> <p>23 A. Usually if somebody does a -- an</p> <p>24 investigation on that person where they look into</p>
<p>Page 34</p> <p>1 on computer. We'd write it by hand.</p> <p>2 Q. Okay. And are those records kept</p> <p>3 anywhere, as far as you know?</p> <p>4 A. With each detainer, most of the time</p> <p>5 there's a scratch 213, yes.</p> <p>6 Q. As far as you know, if a detainer was</p> <p>7 issued then against Mr. Mayorov, the plaintiff in</p> <p>8 this case, would there be a scratch 213 for him?</p> <p>9 A. If it was done at Stateville, there</p> <p>10 should be, yes.</p> <p>11 Q. Okay. If you determine an individual's</p> <p>12 removable from the United States through your</p> <p>13 interview or screening, what would you do next?</p> <p>14 A. If the subject is removable --</p> <p>15 Q. Yes.</p> <p>16 A. -- from the United States, then I would</p> <p>17 place a detainer on the subject.</p> <p>18 Q. Okay. Do you input the data into any</p> <p>19 other system or record it anywhere else?</p> <p>20 A. Yes. It's -- at that time, it was</p> <p>21 called ENFORCE.</p> <p>22 Q. Okay. Could you describe that</p> <p>23 database?</p> <p>24 A. I don't know if I'm allowed to.</p>	<p>Page 36</p> <p>1 that person with a little bit more than, you know,</p> <p>2 a 30-second conversation, that they're actually</p> <p>3 requesting the A File, requesting the parents' A</p> <p>4 Files, they -- they'll write a report on it in</p> <p>5 ENFORCE.</p> <p>6 Q. Okay. And would you ever request an A</p> <p>7 File on a -- on an inmate that you interviewed?</p> <p>8 A. Yes, I would.</p> <p>9 Q. Okay. Under what circumstance would</p> <p>10 you request the A File?</p> <p>11 A. Usually if I did not believe what the</p> <p>12 person said, I would request the A File to see what</p> <p>13 was inside the A File.</p> <p>14 Q. And how quickly would you receive that</p> <p>15 A File?</p> <p>16 A. Anywhere from two to four weeks.</p> <p>17 Q. And would you -- were there cases where</p> <p>18 you would also look into the A File of an</p> <p>19 individual's parents?</p> <p>20 A. Absolutely, yes.</p> <p>21 Q. And would you follow the same procedure</p> <p>22 of requesting the parents' A File?</p> <p>23 A. Again, on those cases where I did -- I,</p> <p>24 I had questions, I, I would look into the parents',</p>

1 yes. 2 Q. And I think you said, and let me know 3 if this is incorrect, that you're allowed to update 4 the ENFORCE database? 5 A. Yes, you -- 6 Q. Okay. 7 A. We are able to update ENFORCE. 8 Q. Okay. And would you -- 9 A. But ENFORCE is not CIS. I just want to 10 make that clear. 11 Q. Oh, yeah. No problem. 12 And then are you required to update an 13 ENFORCE entry if it doesn't reflect that somebody 14 is a U.S. citizen and you have determined they are 15 a U.S. citizen? 16 A. No. Nothing's in writing about doing 17 it, no. 18 Q. Okay. Do you know whose responsibility 19 that would be? 20 A. As far -- I mean, if you're -- found 21 somebody to be a citizen, for me, I would update 22 it, but nothing's in writing that it has to be 23 done. 24 Q. Okay. Would there ever be cases where	Page 37 1 Q. Okay. And what's a biometric hit? 2 A. A biometric hit is when somebody's 3 fingerprints are in and there's a match with our 4 system to the fingerprints that are ran when 5 they're arrested. 6 Q. Were you aware that Secure Communities 7 Processing Center reviews the records of inmates 8 screened at Stateville? 9 A. I know they -- that they have in the 10 past. 11 Q. Okay. 12 A. I -- yes, I'm aware of that. 13 Q. When did you first become aware of 14 that? 15 A. I became aware of it because 16 occasionally I would get a, a e-mail or a call from 17 an agent in Secure Communities asking if I 18 interviewed a particular inmate. 19 Q. Sure. And so you're, you're aware that 20 they review records of inmates screened by the ICE 21 agents at Stateville? 22 A. They don't review records of the ICE 23 agents, no. 24 Q. Or, no, of the inmates that you've
Page 38 1 you reported up to anyone to update the ENFORCE 2 database? 3 A. For me, I always enter my own 4 information. As far as passing on information, 5 it's not something I do, no. 6 Q. And do you know how long it would take 7 to update the ENFORCE database to reflect that 8 someone was a U.S. citizen? 9 A. As far as I know, it's pretty much as 10 soon as you hit save, it's updated. 11 Q. Okay. And I know you've mentioned some 12 other databases like CIS. Do you know how long it 13 would take to update any of those systems to 14 reflect a citizenship status change? 15 A. I have no idea. 16 Q. Okay. Are you familiar with Secure 17 Communities Processing Center? 18 A. Yes. 19 Q. What is that? 20 A. I don't know if I could really define 21 Secure Communities. It's one of the sections we 22 rotate into, and they have -- it's a 24-hour 23 center. Sometimes it -- people call in, sometimes 24 they get biometric hits.	Page 38 1 screened. 2 A. It's possible. 3 Q. Okay. And do you know if they review 4 all the records of the inmates screened by the ICE 5 agents? 6 A. No, I am not sure. 7 Q. Do you know how they make that 8 decision, of which inmate's records to review that 9 you've processed? 10 A. I believe, and this is what I'm not a 11 hundred percent sure, but I believe it would be 12 through the biometric hits. 13 Q. Okay. Do you ever run any other sort 14 of background checks on the inmates other than the 15 electronic systems you've mentioned here already? 16 A. Other than interviewing and electronic 17 checks and maybe calling family members, no. 18 Q. Do you ever look into any other 19 hard-copy records other than the A File? 20 A. I, I don't get what you're asking. 21 Maybe a birth certificate? I -- stuff like that. 22 Q. Sure. And when would you make that 23 request? 24 A. If somebody claimed that they were born

1 in Cook County, I may try to get their Cook County 2 birth certificate. 3 Q. Okay. Is there any, you know, protocol 4 that you have or that you're required to follow 5 requiring further investigation to a certain inmate 6 as opposed to another inmate? 7 A. No. 8 Q. So your protocols are roughly the same 9 for all the inmates that you'd see? 10 A. What do you mean by protocol? 11 Q. The questions that you ask, is there, 12 is there ever a point or any sort of triggers that 13 require further investigation into someone else 14 rather than one inmate versus another? 15 A. Well, yes, if somebody -- like I said, 16 if they have an accent, if they say they were born 17 somewhere else. There's different factors that 18 come into play as far as how many questions I'm 19 going to ask someone. 20 Q. Okay. And then in your experience, 21 were there cases where you had to discuss an 22 inmate's status with another ICE agent onsite or 23 one of your supervisors offsite? 24 A. Yes.	Page 41 1 to take a sworn statement or a recorded statement 2 for an interview? 3 A. No. 4 Q. Okay. Are those records kept somewhere 5 if you do document them? 6 A. If we have taken a sworn statement, it 7 should be included in the A File. 8 Q. Okay. And it's our understanding that 9 there's some sort of log that you keep each day, is 10 that correct, that you summarize kind of the daily 11 report of inmates that you've seen? 12 A. That's correct. 13 Q. And would you prepare that, or is that 14 a group effort? 15 A. It would be -- we'd switch off. It 16 wouldn't be one particular person's responsibility. 17 But during different time frames, you know, one 18 person may be responsible of the three of you. 19 Q. And what information is kept on that 20 log? 21 A. There were different logs. One log 22 would be every person that we talked to that day 23 and their inmate numbers. Another log would be 24 people we placed detainees against.
Page 42 1 Q. And what cases would those be? 2 A. Sometimes we'd have two individuals 3 using the same identity and we'd have to ask a 4 supervisor about placing a detainer on that subject 5 because one person would be a citizen and the other 6 person wouldn't. Sometimes with the, the 7 naturalization charts -- it's very confusing 8 because there's so many dates -- you'd have to 9 ask -- you'd go to another agent you trusted to 10 say, is it possible this person is a citizen. So, 11 I mean, there are plenty of times that you do 12 consult with other agents. 13 Q. Okay. Do you ever take any sworn 14 statements or record statements of an inmate in any 15 way? 16 A. Yes, I do take sworn statements on 17 occasion. 18 Q. Why would you do that? 19 A. The majority of the time we take a 20 sworn statement, it's on somebody that's been 21 deported previously -- 22 Q. Okay. 23 A. -- or removed previously. 24 Q. Is there any requirement that you have	Page 42 1 Q. Okay. Do you know if there's an 2 item -- a line item for someone's citizenship 3 status on either of those logs? 4 A. I believe there was, yes. 5 Q. Okay. And then who would you send that 6 report to? 7 A. I'd send it to my SDDO, I believe, at 8 that time, which was not my -- yeah, my supervisor 9 would be copied. 10 Q. Okay. And is that an electronic record 11 or is that a hard copy? 12 A. It would be electronic. 13 Q. Okay. Are there any other records that 14 you would keep from a screening interview other 15 than this log and then the scratch 213 you 16 mentioned before? 17 A. We'd keep CIS claims. Whatever we ran 18 that day on -- specifically on people that we 19 placed detainees on. 20 Q. Okay. And would that -- would include 21 if you ran a system check on their parent also? 22 A. Yes, that would be in with the 23 paperwork with the detainer, if we ran the parent 24 that day.

1 Q. Okay. Would you keep a scratch 213 or 2 any other records if you didn't issue a detainer? 3 A. No. 4 Q. Okay. Do you know if ICE uses any 5 outside companies to conduct its screenings? 6 A. Do you mean at Stateville? 7 Q. Yes. 8 A. No, it was always ICE staff at 9 Stateville. 10 Q. As, as far as you know, there were no 11 other contractors or third parties? 12 A. At Stateville, no. 13 Q. Okay. Do you know what the Impact 14 Incarceration Program or Boot Camp is at 15 Stateville? 16 A. I'm aware of the Boot Camp at 17 Stateville. I'm not fully knowledgeable of what, 18 what the process is or what they do there. 19 Q. What's your level of involvement with 20 the program? 21 A. With the Boot Camp program? 22 Q. Yes. 23 A. I don't have any involvement. I'm a 24 federal employee. That's a state program.	Page 45	1 Oh, here it is. 2 A. No, it's still up here. 3 Q. We can move into this document if you 4 want. 5 A. Okay. 6 Q. <u>Exhibit 3</u> , it's on the second-to-last 7 page here. 8 You recognize this document? 9 A. Yes, I do. 10 It states that the individual here is 11 going to Boot Camp on this page. 12 Q. And if it includes that information, is 13 there any change in how you screen an inmate or 14 what questions you might ask? 15 A. As far as whether they're going to Boot 16 Camp or not, no, it's the same, same line -- same 17 questioning for each person coming through. 18 Q. Okay. 19 A. Like I said, I mean, there's no 20 specific questions we ask, but... 21 Q. Okay. And were you ever aware that 22 Mr. Mayorov, the plaintiff in this case, was to be 23 part of the Boot Camp program? 24 A. I don't remember speaking to the	Page 47
1 Q. Sure. Are you aware of any of the 2 eligibility requirements for the program? 3 A. No, not -- I, I don't know what makes a 4 person eligible, no. 5 Q. Okay. Do you know then, you know, what 6 effect an immigration detainer would have on 7 eligibility? 8 A. I am aware that if somebody did have a 9 detainer, that they may be pulled out of Boot Camp 10 or may not be eligible. 11 Q. Okay. Are you aware of any individual 12 who was participated to permit to participate in 13 the program with an immigration detainer lodged 14 against him or her? 15 A. I don't have any knowledge of that. 16 Q. Okay. Do you have -- do you ever 17 receive any information about whether an inmate is 18 to participate in the program when you're screening 19 them? 20 A. Yes. If you refer to -- oh, I don't 21 think you introduced that. 22 MR. KUHN: Sure. 23 MR. RAJADURAI: We can -- 24 MR. KUHN: You can pull it out here.	Page 46	1 subject, so I'm not aware that he was part of Boot 2 Camp, no. 3 Q. Do you ever recall speaking to any 4 other agents, including Agent Reynoso, about 5 Mr. Mayorov? 6 A. The only time I spoke to her was when I 7 was told that there was a lawsuit and we just 8 looked back to see if we had any information -- 9 Q. Okay. 10 A. -- at that time. 11 Q. And do you know what records you looked 12 to? 13 A. We did find the -- this sheet here and 14 we did provide that sheet. That was all we had. 15 Q. Okay. In looking at that sheet, do you 16 recognize the handwriting on that? 17 A. Yes. 18 Q. Whose handwriting is that? 19 A. It's Mayra's. 20 Q. Okay. Do you see where it says USC? 21 A. Child of a USC? 22 Q. Yes. 23 A. Yes. 24 Q. And what does that stand for?	Page 48

	Page 49	Page 51
1 A. Basically, on that date she's noting 2 that she chose not to place a detainer on that 3 subject; that that subject may have derived 4 citizenship. But she's not saying he is a USC; 5 she's saying he's a child of a United States 6 citizen. 7 Q. Okay. And do you know who else would 8 receive this sheet other than the ICE agents? 9 A. I'm not positive. In -- at one point 10 they were being scanned in to the supervisor, but 11 I'm not positive if it was during this time frame. 12 Q. Okay. And then if, if, if there is a 13 notation there of child of a U.S. citizen, are you 14 required to update that information or to inform 15 anyone else that you might have a potential claim 16 for citizenship? 17 A. No. 18 Q. Okay. And as far as you know, do you 19 know where Agent Reynoso would have got the 20 information that Mr. Mayorov was a child of a U.S. 21 citizen? 22 A. By talking to him. 23 Q. Okay. Were you aware that -- and -- 24 that Mr. Mayorov was to be part of the Boot Camp	1 Q. Okay. All right. Were there occasions 2 when you interviewed an individual during screening 3 that you had this -- had an issue arise that you 4 had to speak to a supervisor? 5 A. Yes. 6 Q. What issues would those be? 7 A. Most of the time it would be involving 8 citizenship, whether we should place a detainer, 9 hold off on placing a detainer. Anything 10 that would -- a lot of gray areas, you do -- you'd 11 contact a supervisor and say, I need your input on 12 this, what do you think. 13 Q. Okay. I guess turning back to 14 Exhibit 3, the second-to-last page of that 15 document, do you know why Agent Reynoso would write 16 that Mr. Mayorov was a child of a United States 17 citizen? 18 A. She, she would write that if he was not 19 born in the United States and she -- I'm assuming 20 she wrote it from her interview. 21 Q. Okay. 22 A. I, I don't know. 23 Q. I mean, do you know if this 24 information -- I think -- you know, you might have	
	Page 50	Page 52
1 Program? 2 A. I do not remember ever talking to him. 3 Q. Sure. Were, were you aware that the 4 Secure Communities Processing Center reviewed his 5 records after he was processed at Stateville? 6 A. Like I said, I wasn't aware of who they 7 reviewed or what was reviewed. 8 Q. Okay. 9 A. I know things were reviewed because I 10 receive e-mails saying, hey, did you talk to this 11 person or that person. But other than that, I'm 12 not aware that this subject was reviewed by Secure 13 Communities. 14 Q. And do you happen to remember who would 15 have sent those e-mails to you? 16 A. The particular agent, if he or she 17 chose to investigate something further, they may 18 have sent an e-mail to me that day. 19 Q. Okay. Were you -- 20 A. It's various agents. 21 Q. Okay. Were you aware that Secure 22 Communities eventually did issue an immigration 23 detainer against Mr. Mayorov? 24 A. Not until today.	1 answered this before. If this information is not 2 available to other agents, is there any reason to 3 write that down? 4 A. Yes, there is a reason to write it 5 down, because there are two separate sheets we'd 6 submit. One was for people born in the United 7 States. One was for people not born in the United 8 States. 9 Q. Okay. 10 A. She would have wrote that down 11 explaining why she didn't take action against him. 12 Q. Okay. So would you say she's required 13 to put that down? 14 A. No. We're not required, no. 15 Q. Okay. And then would, would this 16 document and the information there ever be 17 incorporated into ENFORCE? 18 A. Not by me. Not by, not by me, no. 19 Q. Do you know who might be responsible 20 for that? 21 A. Again, ENFORCE is -- it's an 22 enforcement tool. As far as putting information in 23 ENFORCE, if you didn't take action against that 24 individual, the majority of the time you wouldn't	

1 put that information in. 2 Q. Okay. Are you aware of any Stateville 3 inmates that you processed that received an 4 immigration detainer but then were later determined 5 to be U.S. citizens? 6 A. Yes. 7 Q. And how, how, how many would you say 8 you encountered in your time there? 9 A. Maybe -- in the whole duration, maybe 10 three or four individuals. 11 Q. And if you could, could you develop how 12 those cases unfold? 13 A. A lot of times the people in prison, 14 they're not a -- very involved with their parents. 15 They don't know that they're citizens. So at the 16 time we talk to them, they tell us they were born 17 in Mexico, their parents are from Mexico, and they 18 don't realize, oh, my dad became a citizen or my 19 mom became a citizen. 20 So it's very possible that they may 21 have found out after they talked to us. And 22 whenever they'd come back and talk to us or they'd 23 send us letters, we'd look into it and lift the, 24 the detainer if we found them to be a citizen.	Page 53 1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE NORTHERN DISTRICT OF ILLINOIS 3 EASTERN DIVISION 3 SERGEY MAYOROV } 4 } 4 Plaintiff, } 5 } 5 vs. } 6 } 6 UNITED STATES OF AMERICA, } 7 Defendant. } 8 9 10 This is to certify that I have read my 11 deposition taken on June 6, 2014, in the foregoing 12 cause, and that the foregoing transcript accurately 13 states the questions asked and the answers given by 14 me, with the changes or corrections, if any, made 15 on the Errata Sheet attached hereto. 16 17 JENIFER WALL 18 19 No errata sheets submitted (Please initial) 20 Number of errata sheets submitted pages 21 Subscribed and sworn to 22 before me this day 23 of 2014. 24 Notary Public
Page 54 1 Q. And in any of those cases, do you 2 remember if the individual was participating in the 3 Boot Camp program, Impact Incarceration program? 4 A. In those cases that I placed a detainer 5 on somebody? 6 Q. The cases where it was later determined 7 that they had a U.S. -- they were U.S. citizens. 8 A. That I -- no, none of my cases. 9 Q. Okay. Any other cases that didn't 10 involve you? 11 A. Not that I'm aware of, no. 12 MR. RAJADURAI: Okay. I think that's 13 all I have. 14 MR. FLEMING: That's all. 15 MR. KUHN: I don't have anything. 16 We'll reserve signature. I'll take a copy of 17 whatever. 18 THE REPORTER: Do you want to order? 19 MR. RAJADURAI: Yes. 20 (Deposition concluded).	Page 54 1 STATE OF ILLINOIS } 2 COUNTY OF COOK } SS: 3 4 I, Melody A. Monk, do hereby certify 5 that JENIFER WALL was duly sworn by me to testify 6 the whole truth, that the foregoing deposition was 7 recorded stenographically by me and was reduced to 8 computerized transcript under my direction, and 9 that said deposition constitutes a true record of 10 the testimony given by said witness. 11 12 I further certify that the reading and 13 signing of the deposition was not waived, and the 14 deposition was submitted to James M. Kuhn, Sr., 15 defendant's counsel, for signature. Pursuant to 16 Rule 30(e) of the Federal Rules of Procedure, if 17 deponent does not appear or read and sign the 18 deposition within 30 days, the deposition may be 19 used as fully as though signed, and this 20 certificate will then evidence such failure to 21 appear as the reason for signature not being 22 obtained. 23 24 I further certify that I am not a 25 relative or employee or attorney or counsel of any 26 of the parties, or a relative or employee of such 27 attorney or counsel, or financially interested 28 directly or indirectly in this action. 29 30 IN WITNESS WHEREOF, I have hereunto set 31 my hand and affixed my seal of office at Chicago, 32 Illinois, this 14th day of June 2014. 33 34 Illinois CSR No. 084.004772 35 Melody A. Monk, RPR 36 37 BARKLEY COURT REPORTERS 38 22 West Washington Street 39 15th Floor 40 Chicago, Illinois 60602 41 800.222.1231 42 43 44